

April 15, 2011

Mr. Tom Gainer
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

**Subject: Pipeline and Utility Support Rack Footing Excavation Soil Sampling,
February 1, 2011
Terminal 4 Slip 1 Upland Facility (ECSI No. 2365)
Response to DEQ Comments Provided via email March 22, 2011**

Dear Tom:

The purpose of this letter is to provide Oregon Department of Environmental Quality (DEQ) with a response to comments received in an email dated March 22, 2011 on the letter reporting the results of the above referenced sampling. DEQ comments and the Port's responses are presented below.

DEQ Comment 1: Please discuss the potential source of the stained soil.

Response: The Remedial Investigation (RI) for Terminal 4 Slip 1 Facility included a detailed historical investigation to identify potential source areas for investigation. None of the sources identified in the RI account for the presence of the green soil. Therefore, the source is unknown. However, based on the very limited extent encountered during construction, the extent is limited.

DEQ Comment 2: It appears that the lateral extent of the stained soil was not determined (i.e., beyond the footing excavation).

Response: Noted. A soil stockpile adjacent to the footing excavation made further exploration impractical. However, the thin lens and very limited lateral extent observed at the face of the footing excavation suggests the extent is not large.

DEQ Comment 3: While this soil contamination does not appear to be a significant threat to the Willamette River under current conditions, potential future property uses in this location should be protective of human health and the environment. This area should be included in the Site's CMMP.

Response: The Port believes this material is de minimus in nature and does not require inclusion in a contaminated media management plan (CMMP) based on the following:

- Concentrations of total and hexavalent chromium are below the DEQ risk-based concentrations for Occupational Direct Contact (September 2009 Update);
- Limited extent and volume (estimated at less than 1 cubic yard); and
- The Port follows standard protocols for addressing unusual conditions encountered in construction projects as defined in Port Master Specification 011100, Paragraph 1.8.A – Suspected Hazardous or Environmentally Sensitive Conditions (available upon request).

Please call me at (503) 415-6676 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly Madalinski". The signature is fluid and cursive, with the first name "Kelly" and last name "Madalinski" clearly distinguishable.

Kelly Madalinski
Environmental Project Manager

c: Kristine Koch, EPA
Dennis Klein, Cargill Inc.
Colleen Knapp, Cargill Inc.
Kimberly Thorstad (Cargill)
Gene Loffler, CLD PacificGrain, LLC
Arnie Schaufler, CLD PacificGrain, LLC
Bill Ford, Lathrop & Gage
Jessica Hamilton, Port
Suzanne Barthelmess, Port
David Breen, Port
Michael Pickering, Ash Creek Associates
Mark Lewis, Formation Environmental
LWP File